

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF MICHIGAN**

Dimitrios George Cecil,

Case No. 05-CV-71805-AC-SDP

Plaintiff,

Hon. Avern Cohn

v.

**STIPULATED PROTECTIVE ORDER**

Viacom Outdoor Group, Inc., a foreign corporation, and Gannett Outdoor Marketing, Inc., a domestic corporation, and Combined Communications Corporation, d/b/a Gannett Outdoor Co. of Michigan, an inactive foreign corporation,

Defendants.

---

RICHARD E. SEGAL & ASSOCIATES  
By: Richard E. Segal (P33107)  
Todd W. Grant (P45531)  
6230 Orchard Lake Road, Suite 294  
West Bloomfield, MI 48322  
(248) 855-4880  
Attorneys for Plaintiff

---

BODMAN LLP  
By: James J. Walsh (P27454)  
J. Adam Behrendt (P58607)  
201 West Big Beaver Road, Suite 500  
Troy, MI 48084  
(248) 743-6000  
Attorneys for Defendants Viacom Outdoor Inc.  
and Combined Communications Corporation,  
d/b/a Gannett Outdoor Co. of Michigan

---

### **STIPULATED PROTECTIVE ORDER**

This matter comes before the Court upon the parties' stipulation as to the entry of a protective order relating to the dissemination and/or disclosure of information and documents relating to the business operations of defendants Viacom Outdoor Inc. and Combined Communications Corporation, d/b/a Gannett Outdoor Co. of Michigan that have been produced to date and/or that will be produced, including, but not limited to, financial documents, lease information, documents relating or referring to customers of defendants and/or sales activities. Now, therefore;

Having been fully advised on the premises;

**IT IS HEREBY ORDERED THAT:**

Before or after the entry of this order (regardless of whether they are marked as "Confidential") all financial documents, leases, documents relating or referring to the identity of actual customers of defendants or revenue received from such customers and information or documents relating to the actual leases that defendants (or any of them) have executed with any third party that allows defendants to maintain any outdoor advertising structures disclosed in this litigation shall be held strictly confidential. They shall use such documents and information only in connection with this lawsuit and they shall not disclose, reveal or share such documents and information with any third parties except: (a) as required by law or Court order; (b) as necessary to depose witnesses; or (c) with accountants, attorneys or other professionals providing assistance to the parties in this lawsuit, or the employees of such professionals, provided that such professionals or employees shall be made aware of the restrictions on disclosure of such information. This

restriction shall not apply to documents and information that are publicly known at the time of production or that become generally known other than through disclosure inconsistent with this paragraph. Nor shall this restriction prevent defendants from using such documents or information in connection with their business operations. All discovery and other material filed with the Court, including, inter alia, transcripts of depositions, exhibits, briefs and memoranda, which comprise or contain information covered by this order shall be filed in sealed envelopes or other appropriately sealed containers on which shall be endorsed with the title of this action, an indication of the contents of such sealed envelope or other container, the identity of the party filing the materials, the word "CONFIDENTIAL" and a statement substantially in the following form: "This envelope (container) contains documents (objects) subject to the protective order entered in this action. It is not to be opened nor the contents thereof displayed, revealed or made public, except by order of the Court." The parties shall return all documents containing confidential information to the producing party upon the end of this matter (including any subsequent appeals) or confirm their destruction.

IT IS SO ORDERED.

s/ Avern Cohn  
U.S. District Court Judge

Dated: June 20, 2005

Agreed as to form:

RICHARD E. SEGAL & ASSOCIATES

s/ Richard E. Segal

Richard E. Segal (P33107)

Todd W. Grant (P45531)

6230 Orchard Lake Road, Suite 294

West Bloomfield, MI 48322

(248) 855-4880

Attorneys for Plaintiff

BODMAN LLP

s/ James J. Walsh

James J. Walsh (P27454)

J. Adam Behrendt (P58607)

201 West Big Beaver Road, Suite 500

Troy, MI 48084

(248) 743-6000

Attorneys for Defendants Viacom Outdoor Inc.  
and Combined Communications Corporation,  
d/b/a Gannett Outdoor Co. of Michigan